

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

**ASTORIA KING,
individually and on
behalf of those similarly
situated,
Plaintiff,
vs.
THREE SISTERS
ENTERTAINMENT, INC.,
et al,
Defendants.**

**CIVIL ACTION
1:22-cv-04235-LMM**

CONSENT MOTION TO EXTEND DISCOVERY PERIOD

Plaintiff Astoria King (“Plaintiff”), individually and on behalf of all others similarly situated, and Defendants Three Sister’s Entertainment, Inc. and Nianna Wright (“Defendants”), by and through their undersigned counsel, file this Motion to extend the Discovery period, showing this honorable Court as follows:

1. On September 13, 2023, the Parties filed a Consent Motion to Extend Discovery Period, jointly requesting that the discovery deadline of September 19, 2023, be extended to November 3, 2023. [Doc. 27].
2. As the Parties represented to the Court in their September 13, 2023, Motion, the Parties needed additional time to schedule and conduct a Rule 30(b)(6) deposition of Defendant Three Sister’s Entertainment, Inc., as well as additional

time to complete outstanding written discovery. *Id.* This Court granted the Parties' Motion on September 13, 2023. [Doc 28].

3. Plaintiff's counsel took a 30(b)(6) deposition of Defendant Three Sister's Entertainment, Inc., on October 27, 2023. The deponent, however, was not knowledgeable about all of the matters and topics set forth in Plaintiff's Amended Notice of Deposition Pursuant to Rule 30(b)(6). Defendants intended to designate and present a second individual to be deposed as well pursuant to the Amended Notice, but this individual was unavailable last minute due to a funeral out-of-town.

4. The Parties have agreed to hold open the Rule 30(b)(6) deposition due to this second individual's unavailability. The Parties have tried scheduling a date and time this week to complete the Rule 30(b)(6) deposition prior to the discovery deadline but have been unable to do so due to the availability of this individual and the availability of Defendants' counsel, who has also more recently been ill.

5. The Parties jointly request that the discovery period be extended from its existing cut-off date of November 3, 2023, to January 12, 2024.

6. The Parties need this extension to complete some outstanding discovery, including some remaining written discovery and concluding the Rule 30(b)(6) deposition, to fully develop the factual record in this case. The Parties

believe that this much additional time is necessary to account for the upcoming holiday season and the availability of the Parties and their counsel to complete the remaining discovery.

7. The Parties are working together to complete the outstanding discovery and believe that the remaining discovery should be completed by a new discovery deadline of January 12, 2024.

8. For the above and foregoing reasons, the Parties respectfully request that the discovery deadline be extended until January 12, 2024, and that all other pretrial deadlines be extended accordingly.

9. This motion is not brought for the purpose of delay, and the requested extension will not prejudice any party.

This 31st day of October, 2023.

Respectfully submitted,

PLAINTIFF ASTORIA KING

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